


# **EXHIBIT 22**

**From:** Charter debndave@charter.net   
**Subject:** Fwd: Legal Dispute  
**Date:** July 20, 2022 at 7:28 PM  
**To:** Robert S. Swindler scott@4smanagement.net

---



Sent from my iPhone

Begin forwarded message:

**From:** Brendan Church <brendan@oldsouthtrade.com>  
**Date:** March 11, 2022 at 7:33:32 PM CST  
**To:** Brendan Church <brendan@oldsouthtrade.com>  
**Subject:** Legal Dispute

Dear Note holders,

We are writing today to update you on some recent legal actions. As some of you are aware, Old South Trading Co. LLC (the “Company”) is currently engaged in an ongoing dispute with a certain customer related to the customer’s purchase of KN95 Masks. In an arbitration action, the customer alleges that Old South did not deliver the masks and is seeking financial restitution. Although Old South vehemently denies these claims, a judgement was rendered in the customers’ favor, however for a far less amount than was sought. While the customer has filed a motion to confirm the judgement, Old South intends to file a motion to vacate the judgement.

In regard to the lawsuit in South Carolina, we understand that many of you have been served and anticipate more to follow. As before, Old South believes this lawsuit to be frivolous and an attempt by the customer to harass the Company into paying monies to this customer under a judgement that is not final and therefore not enforceable. It is disheartening to both Old South and Mr. Church that this tactic is being undertaken as his relationship with the noteholders is of the utmost priority.

To that end, Old South Company and Mr. Church intend to file a motion to dismiss the lawsuit based on, among other potential grounds, the Court does not have personal jurisdiction over you; that the Court lacks jurisdiction over the entire matter because the case is not yet ripe for determination; the Complaint and Amended complaint fail to state a claim upon which relief can be granted; these issues have been waived because they should have been raised in the aforementioned arbitration or in the alternative, the matter must be stayed and referred back to arbitration; Plaintiffs have failed to join multiple indispensable parties; and the matter has been brought in the wrong venue.

Mr. Church and Old South hope to be successful in intervening in this matter and getting the matter dismissed in full.

However, in the meantime, as you are aware, each of you has thirty days from the date you received the Amended Complaint and Summons to respond to it.

You are of course free to choose your own counsel to assist you in this endeavor . However, Sarah Spruill at Haynesworth Sinkler Boyd (<https://www.hsblawfirm.com/attorneys/sarah-p-spruill>) has been apprised of the situation and has agreed and is prepared to represent you.

Old South will provide an update in the coming week on its progress in getting the matter dismissed. In the meantime please do not hesitate to contact Old South through Brendan Church at [Brendan@oldsouthtrade.com](mailto:Brendan@oldsouthtrade.com) with any questions or to discuss any aspect of the matter.

Brendan Church | Owner  
Old South Trading Co. LLC  
1503 S. Buncombe Rd.  
Greer, SC 29651  
O.864-334-5061  
C.615-517-8199  
[brendan@oldsouthtrade.com](mailto:brendan@oldsouthtrade.com)  
[www.oldsouthtrade.com](http://www.oldsouthtrade.com)



**OLD SOUTH TRADING**

